

SCOTT ZWEIG; MARY MCGOWAN	)	
	)	
Petitioners,	)	SUPERIOR COURT
	)	
vs.	)	J.D. OF HARTFORD
	)	
WEST HARTFORD BOARD OF	)	AT HARTFORD
EDUCATION; WEST HARTFORD PUBLIC	)	
SCHOOLS; THOMAS MOORE, in his official	)	
capacity; ANDREW MORROW in his official	)	
capacity;	)	
	)	
Respondents.	)	
	)	June 6, 2022

**VERIFIED PETITION FOR WRIT OF MANDAMUS AND COMPLAINT FOR  
DECLARATORY AND INJUNCTIVE RELIEF**

**INTRODUCTION**

1. On February 1, 2022, the West Hartford Board of Education (hereinafter the “Board of Education” or “Board”) passed two motions (the “Renaming Motions”) concerning the names used by interscholastic athletic teams at Frederick U. Conard High School (“Conard High School”) and William H. Hall High School (“Hall High School” collectively, the “High Schools”).

2. The Renaming Motions “discontinued” the use of the names “Chieftains” and “Warriors” at the High Schools and ordered the principals of the High Schools to “appoint a committee at their school...to develop a new name by June 7, 2022.”

3. On Tuesday, June 7, 2022, the Board is scheduled to vote to approve new team names for both Conard High School and Hall High School.

4. The Board’s purported justification for the Renaming Motions was the recent adoption of Public Act 21-2 by the Connecticut Legislature<sup>1</sup> and the Board’s Policy 1800 Educational Equity (“Policy 1800”). See Ex. 1.

---

<sup>1</sup> Public Acts, Spec. Sess., June, 2021, No. 21-2, § 63(l). This section provides that “...no municipality shall be paid a grant from the Mashantucket Pequot and Mohegan Fund, established pursuant to section 3-55i, if a school under the jurisdiction of the

5. The Board's process in passing the Renaming Motions contained numerous procedural and substantive flaws, and is therefore invalid.

6. In an effort to avoid this litigation, on May 16, 2022, Zweig sent a letter to the Board detailing the Board's failure to comply with specific Board policies, as well as state and federal law. See Ex. 2

7. Zweig's letter demanded that the Board nullify the Renaming Motions and cease all actions related to the renaming of the teams at the High Schools.

8. Given the substantial community interest in this issue<sup>2</sup>, Zweig's letter also urged the Board "to engage in a comprehensive, transparent and unbiased process that complies with all Board policies and bylaws, as well as applicable state and federal law," if it chose to revisit this issue in the future.

9. On May 25, 2022, Corporation Counsel Dallas Dodge responded to Zweig's letter on behalf of the Board. However, the response failed to address the crux of Zweig's letter: how the Board's actions regarding the Renaming Motions complied with the referenced Board policies and due process. See Ex. 3.

10. Despite the important procedural and substantive issues underlying the Renaming Motions, the Board has not corrected its actions or sufficiently explained how its actions complied with specific Board policies or due process.

---

board of education for such municipality, or an intramural or interscholastic athletic team associated with such school, uses any name, symbol or image that depicts, refers to or is associated with a state or federally recognized Native American tribe or a Native American individual, custom or tradition, as a mascot, nickname, logo or team name." However, this section also provides an exemption for municipalities to continue to receive funding if they obtain written consent from a state or federally recognized Native American tribe in the area, and an additional one-year grace period for municipalities who intend to obtain such consent.

<sup>2</sup> A petition drafted by Petitioners pursuant to Section XI of the West Hartford Town Charter, which proposes that the team names for the High Schools "shall not be changed without a vote of the electors of the Town of West Hartford" is currently circulating and already has approximately 1,700 signatures of registered West Hartford voters.

11. With the Renaming Motions still in effect, the principals at the High Schools are scheduled to present new team names to the Board for approval on June 7, 2022.

12. If the Court allows the Renaming Motions to remain in effect, Petitioners will be irreparably harmed, because the team names of the High Schools will be changed, resulting in certain but undisclosed costs to taxpayers, based on a process that violated Board policies and due process of law. Time is of the essence.

### **JURISDICTION AND VENUE**

13. Pursuant to General Statutes § 52-485, § 52-29 and § 52-471, this Court has jurisdiction to issue a writ of mandamus, declaratory and injunctive relief requested herein.

14. Venue is proper in Hartford County Superior Court because the parties are conducting business, and the acts complained of herein took place, in Hartford County.

15. Petitioners have no other adequate remedy at law.

### **PARTIES**

16. Petitioner Scott Zweig is a resident of West Hartford, Connecticut who graduated from Hall High School.

17. Petitioner Mary (Haggerty) McGowan is a resident of West Hartford, Connecticut who graduated from Hall High School. McGowan is the mother of three Conard High School graduates, one current Conard High School student and one student who will enroll at Conard High School next year. In addition, three of McGowan's siblings graduated from Conard High School and four graduated from Hall High School.

18. West Hartford Board of Education (the "Board of Education" or "Board") is the governing body of the West Hartford Public Schools. The Board determines policies, rules and procedures for all public schools in the West Hartford, Connecticut.

19. West Hartford Public Schools (“WHPS”) is a local education agency in West Hartford, organized and existing under the Constitution and laws of the State of Connecticut.

20. Respondent Thomas Moore is the current Superintendent of WHPS. Mr. Moore will be leaving this position on June 30, 2022. Mr. Moore is sued only in his official capacity.

21. Respondent Andrew Morrow is the current Assistant Superintendent for administration for WHPS. Mr. Morrow will assume the role of interim Superintendent of WHPS on July 1, 2022. Mr. Morrow is sued only in his official capacity.

### **FACTUAL ALLEGATIONS**

22. On March 25, 2015, the Board unanimously adopted Policy 1700 School Nicknames and Images (“Policy 1700”), which states “the use of mascots, symbols, images, or nicknames that are directly related to or commonly associated with any particular race or ethnicity is prohibited. Acknowledging the long-standing tradition that has developed around the use of the names “Chieftain” and “Warrior,” the terms “Chieftain” and “Warrior” are **expressly exempted from this prohibition.**” (emphasis added.) See Ex. 4.

23. Almost seven years later, during a Board meeting on December 7, 2021 (the “December Meeting”), Board member Jason Chang introduced a motion to “bring the district into compliance with Public Act 21-2 with a vote to discontinue the use of Chieftain and Warrior and create a process to adopt new mascots.”<sup>3</sup>

24. After some discussion, Chang amended his motion to “address Public Act 21-2 with a vote on the use of “Chieftain” and “Warrior” and create a process, if necessary, to adopt new measures on February 1, 2022.” See Ex. 5. The motion passed.

---

<sup>3</sup> For reasons unknown to the Petitioners, the Board waited 159 days after enactment of Public Act 21-2 to raise this topic during a public meeting for the first time.

25. Neither Mr. Chang's initial motion nor his revised motions were included on the agenda published prior to the December Meeting. See Ex. 6

26. In fact, the agenda published by the Board in advance of the December Meeting contained an inadequate and misleading agenda item, which stated only that the Board would "...review the continued use of "Chieftain" and "Warrior" in light of recent changes to CT legislation and BOE policy." See Ex. 6.

27. This misleading agenda prevented interested residents from understanding the importance of the December Meeting, and either attending the meeting or seeking additional information from the Board.

28. West Hartford residents had no way of knowing that the Board's "review" of the continued use of the names would merely consist of a brief discussion at the December Meeting, followed by a final vote only 56 days later.

29. Based on information and belief, the December Meeting was the first time since 2015 that the Board publicly addressed or discussed the topics of the team names used by the High Schools<sup>4</sup>.

30. While the Board passively "invited" community feedback on the subject, there was no agenda topic, discussion or debate on the subject during either of the next two public meetings held on December 21, 2021 and January 18, 2022.

31. Instead, at the conclusion of the December 21, 2021 meeting, Thomas-Farquharson provided a terse "update" regarding the process undertaken by the Board.

---

<sup>4</sup> If the Board attempts to now claim that this subject matter was discussed at any regular or special meetings of the Board prior to the December Meeting, the Petitioners requests copies of the agenda and minutes from such meetings, pursuant to General Statutes § 1-225, which have not been previously disclosed to the public in violation of General Statutes § 1-200 through § 1-259.

32. During this update, Thomas-Farquharson revealed that the Thomas Moore, on behalf of the WHPS and the Board, sent letters dated October 20, 2021 to representatives from each of the five Native American Tribal Nations in Connecticut seeking input on the use of the team names used by the High Schools.

33. Based on information and belief, this was the first time that the Board publicly disclosed that they contacted the five Native American Tribal Nations in Connecticut regarding the team names used by the High Schools.

34. Based on information and belief, the existence of these letters was known to the Board for approximately two months but withheld from the public.

35. In February 2015, based on significant community interest, the Board held a public forum on the issue of the team names and images used by the High Schools. The purpose of the forum was to allow interested members of the community to share their thoughts and opinions on the topic. According to media reports, over 250 people attended the forum and approximately 50 speakers offered public comment.<sup>5</sup>

36. The outcome of the Board's review, which included the public forum, was a unanimous decision to retain the names "Chieftain" and "Warrior" at the High Schools and retire their former Native American imagery. As part of that unanimous decision, the Board adopted Policy 1700, explicitly permitting the continued use of "Chieftain" and "Warrior."

37. A public forum, like the one held in 2015 was proposed by the Petitioners and other members of the community, but the proposal was rejected by the Board.

---

<sup>5</sup> <https://we-ha.com/west-hartfords-native-american-mascot-debate-takes-center-stage-community-forum/>

38. Instead, during a surge in the COVID-19 pandemic and the weeks leading up to and following the Winter holidays, the Board simply stated that they would like to hear feedback from the students and the community.

39. Unlike the towns of Canton and Watertown, whose boards of education established formal committees in 2020 and 2021 to review a potential name/mascot change, the Board formed no such committee.

40. Unlike the towns of Canton and Watertown whose committees convened for approximately 5 months (Canton) and 1 year (Watertown) before providing detailed reports and recommendations to their boards of education prior to any decision, the Board undertook no such effort.

41. Prior to the final vote during the February 1, 2022 meeting, student representatives from both High Schools shared the results of their student surveys regarding the continued use of the names “Chieftain” and “Warrior” at the High Schools.

42. According to Avery Woods Weber, the student representative from Hall High School, approximately 62% of the students who responded to her survey indicated a desire to keep the Warrior name. Only 32% of the students who responded supported a change.

43. According to Andrew Maglio, the student representative from Conard High School, the results of his survey of Conard students were “generally very consistent” with the results of the survey conducted at Hall High School, with approximately 82% of students who responded indicating that they were in favor of keeping the names.

44. Maglio also referenced a historical survey conducted by the Conard High School newspaper in January 2015, which revealed that approximately 60% of students supported keeping the Chieftain name and only 32% in favor of change.

45. Based on information and belief, hundreds of interested members of the community, including current students, parents and alumni, shared their positions on the proposed change with the Board via email in the weeks leading up to the vote.

46. Based on information and belief, over two-thirds of those communications opposed changing the names.

47. Based on information and belief, the community overwhelmingly supported keeping the team names used by the High Schools.

48. However, on February 1, 2022, despite overwhelming support from the community to retain the team names, the Board voted to “discontinue” the use of “Chieftain” and “Warrior” by passing the Renaming Motions.

49. In taking this action, the Board violated its own written policies, as well as the due process rights of the residents of West Hartford.

50. The Board violated Policy 1700 by voting to discontinue the use of the names “Chieftain” and “Warrior” despite express language in Policy 1700 permitting their continued use. Policy 1700 has not been amended or repealed and remains in full effect today.

51. The Board violated Policy 1800 by applying unequal criteria in reaching its decision to change only the team names at the High Schools. Several members of the Board cited the following language from Policy 1800 as the basis for their decision to discontinue the names: “We made a solemn promise to identify and dismantle all elements of systemic racism and historical inequities. We vow to clear paths, with a relentless duty to those in traditionally marginalized groups.”

52. However, in considering only a change to the team names at the High Schools, the Board failed to conduct any reasonable analysis or review of King Phillip Middle School. This



school, which is also under their jurisdiction, is named after Metacomet, a Native American chief of the Wampanoag tribe. The Board failed to take this necessary action despite the middle school's name falling squarely within the language of Public Act 21-2, which the Board claims its actions in passing the Renaming Motions are designed to comply with.

53. Based on information and belief, West Hartford will be prohibited from receiving a grant from the Mashantucket Pequot and Mohegan Fund because King Phillip Middle School uses a "name, symbol or image that depicts, refers to or is associated with a state or federally recognized Native American tribe or a Native American individual, custom or tradition, as a mascot, nickname, logo or team name." (Public Acts, Spec. Sess., June, 2021, No. 21-2, § 63(1).)

54. The Board violated Policy 8310 Formulation, Adoption, Amendment of Policies and Bylaws ("Policy 8310") by failing to hold two readings at public meetings of the Board, prior to any vote to substantively amend an existing Board policy.

55. Policy 8310 states in relevant part that "...substantive amendments of policies and bylaws shall be made only after a second public reading of the proposed change." See Ex. 7

56. By voting to change the High School team names which are already explicitly permitted under Policy 1700, without revising or repealing Policy 1700, the Board effectively approved a substantive amendment to Policy 1700 without satisfying the necessary public notice requirements or holding a vote.

57. By comparison, the Board has a documented history of revising existing written policies, but only after a properly noticed second reading at a public meeting and a public vote, as required by Policy 8310.

58. On February 21, 2018, the Board held a properly noticed second reading and public vote on revisions to the following three policies, as revised by the Board Policy Subcommittee:

4040 Nepotism; Employment of Relatives (provides additional guidance, rules and restrictions on the hiring and employment of family members within the school system), 4160 Publication or Creation of Materials, Copyrights and Patents (expands the school system's legal rights to materials created by employees "on the job" with school funds) and 5720 Search and Seizure (permits the use of breathalyzers and other alcohol screening devices only with the express authorization of the Superintendent)<sup>6</sup>.

59. On February 20, 2019, the Board held a properly noticed second reading and public vote on revisions to Policy 6310 Graduation Requirements (modifying graduation requirements), as revised by the Board Policy Subcommittee<sup>7</sup>.

60. On September 17, 2019, the Board held a properly noticed second reading and public vote on revisions to Policy 5610 Administration of Medication by School Personnel (expanded the rights of students to self-carry and self-administer certain medication, removed immunity for ordinary negligence), as revised by the Board Policy Subcommittee<sup>8</sup>.

61. Considering its past practices and course of conduct concerning compliance with Policy 8310, the Board cannot justify its actions with respect to the Renaming Motions, which clearly violate Policy 8310.

62. Despite Petitioners' request, the Board has provided no reasonable explanation for why it was exempted from compliance with the notice requirements outlined in Policy 8310 in the present matter.

---

<sup>6</sup> See West Hartford Public Schools Board of Education Regular Board Meeting Minutes for February 21, 2018 ([https://westhartford.finalsite.com/uploaded/BOE/BOE\\_Minutes/2017-18/official\\_minutes\\_Feb\\_21\\_2018.pdf](https://westhartford.finalsite.com/uploaded/BOE/BOE_Minutes/2017-18/official_minutes_Feb_21_2018.pdf))

<sup>7</sup> See West Hartford Public Schools Board of Education Regular Board Meeting Minutes for February 20, 2019 (<https://resources.finalsite.net/images/v1554228424/westhartford/kvxcjcjowrrs4go142pc/OfficialMinutesFebruary202019meeting.pdf>)

<sup>8</sup> See West Hartford Public Schools Board of Education Regular Board Meeting Minutes for September 17, 2019 ([https://drive.google.com/file/d/0B0zswKjYBhO\\_ekFDUHdKa25wOE9QV1ZMXzBxUm00R0tiMmNz/view?resourcekey=0-KdkDSXXuCOMFZ09CHqZguA](https://drive.google.com/file/d/0B0zswKjYBhO_ekFDUHdKa25wOE9QV1ZMXzBxUm00R0tiMmNz/view?resourcekey=0-KdkDSXXuCOMFZ09CHqZguA))

63. The Board's blatant disregard for its own written policies and its impact on the residents of West Hartford must be addressed by the Court.

64. If the Board, which is comprised of elected officials, is permitted to ignore or disregard its own written policies when it chooses, the public's faith in the Board and its ability to perform its duties will erode.

65. The Board violated Policy 8120 Limits of Authority ("Policy 8120") by exceeding its authority in directing the principals at the High Schools to "appoint a committee at their school...to develop a new name by June 7, 2022." See Ex. 11.

66. Such action by the Board is clearly prohibited by the plain language of Policy 8120, which states "Board members, either as a whole or individually, shall not...command the service of any school district employee..."

67. The lack of transparency and respect for its ministerial duties that the Board has exhibited throughout the current process has harmed alumni, residents, current students and other members of the community who have positive, closely-held emotional associations with the High Schools and their teams. There exists a tremendous amount of goodwill and intangible sentimental value for the team names among West Hartford residents of all generations. Countless graduates of the High Schools, including Petitioners, proudly call themselves Chieftains and Warriors because for many of them, it is an important part of their identity. By labeling these team names systemically racist and offensive, the Board has severely harmed the athletic and academic reputation of the High Schools, its students and alumni, including Petitioners.

68. Despite numerous requests, the Board and Moore have been intentionally vague or non-responsive to requests for reasonable estimates of the costs associated with removing the existing team names from school equipment, apparel, signage, and other paraphernalia. These costs likely

exceed the estimated \$27,820 that the town of West Hartford is scheduled to receive from the Mashantucket Pequot and Mohegan Fund next fiscal year, provided it complies with Public Act 21-2. As a result, residents of West Hartford are being forced to incur the unknown financial burden of the Renaming Motions which resulted from the unlawful actions of the Board.

69. By contrast, in 2015, Superintendent Moore was quoted as saying that replacing the schools' imagery would cost more than \$50,000 and replacing the team names and the imagery would cost \$97,000, excluding signage outside of the buildings.<sup>9</sup>

70. Critically, since passage of the Renaming Motions, the Schaghticoke Tribal Nation, one of Connecticut's five recognized Native American Tribal Nations, adopted Tribal Council Schaghticoke Tribal Nation Resolution # SNA-022 (dated March 15, 2022), which approves the respectful use of names, images and symbols that recognize the history and culture of Native Americans. This resolution allows West Hartford to comply with Public Act 21-2 and still receive the funding from the Mashantucket Pequot and Mohegan Fund.

### **FIRST CAUSE OF ACTION**

#### **(WRIT OF MANDAMUS (CONN. GEN. STAT. §52-485) – VIOLATIONS OF MINISTERIAL DUTIES)**

71. Petitioners incorporate by reference the allegations contained in each paragraph above, as if those allegations were fully set forth in this cause of action.

72. Respondents have a clear, present and ministerial duty to comply with the law and their own Board policies.

73. Respondents failed to comply with their duties under Policy 1700 by passing the Renaming Motions which directly conflict with the language of Policy 1700.

---

<sup>9</sup> <https://we-ha.com/west-hartfords-native-american-mascot-debate-takes-center-stage-community-forum/>

74. Respondents failed to comply with their duties under Policy 1800 by applying unequal criteria in reaching its decision to change only the team names at the High Schools.

75. Respondents failed to comply with their duties under Policy 8120 by directing principals at the High Schools to appoint committees to develop new names by a date certain. This action exceeded the Board's authority.

76. Respondents failed to comply with their duties under Policy 8310 by failing to hold two public readings at public meetings of the Board prior to any vote to substantively amend an existing Board policy. The Board held no public readings regarding revisions to Policy 1700, nor did the Board hold a formal vote to amend Policy 1700.

77. Accordingly, Respondents have breached and continue to breach their legal duties under their own Board policies governing their affairs.

78. Petitioners have a general, direct, and beneficial interest in ensuring that the WHPS and the Board fulfill their legal obligations.

79. Petitioners have no other adequate remedy at law. Petitioners only legal means of redress is the relief being requested by this Court.

80. If the Court allows the Renaming Motions to remain in effect, Petitioners will be irreparably harmed, because the interscholastic athletic teams at the High Schools will be changed, resulting in certain but undisclosed costs to taxpayers, based on a process that violated the Board's own policies and due process of law.

## **SECOND CAUSE OF ACTION**

### **DECLARATORY RELIEF (CONN. GEN. STAT. §52-471)**

81. Petitioners incorporate by reference the allegations contained in each paragraph above, as if those allegations were fully set forth in this cause of action.

82. An actual controversy exists between the Petitioners and the Board as to whether the Board should repeal the Renaming Motions. Petitioners have requested the Board to take such action, but the Board has declined.

83. Petitioners request a judicial determination that the Board's February 1, 2022 vote, the corresponding Renaming Motions and all related actions are null and void.

84. This determination is necessary and proper because the Board is refusing to abide by the procedures required by the Board's own policies.

### **THIRD CAUSE OF ACTION**

#### **VIOLATIONS OF DUE PROCESS**

**(U.S. Constitution 14<sup>th</sup> Amendment; CONN. CONST., art. I, §4, §5, §8)**

85. Petitioners incorporate by reference the allegations contained in each paragraph above, as if those allegations were fully set forth in this cause of action.

86. Respondents violated Petitioners' rights under the Fourteenth Amendment of the U.S. Constitution and under Article I, §8 of the Connecticut Constitution ("Due Process Rights"), by taking arbitrary and capricious action to rename the interscholastic athletic teams at Hall High School and Conard High School without conducting a comprehensive, transparent and fact-based review, and permitting adequate public comment by interested members of the general public regarding the potential renaming of the teams at each particular school.

87. Respondents violated Petitioners' Due Process Rights by proposing a vote on the team names during a nationwide surge in the Omicron COVID-19 variant and providing only 56 days for interested members of the general public to provide public comment, when there was no urgent legally recognized need to proceed with the vote under such conditions.

88. Respondents violated Petitioners' Due Process Rights by failing to consider in good

faith all options for compliance with § 63 of Public Act 21-2, including the right to seek written consent to continue using the names Chieftain and Warrior from any of the five Native American Tribes recognized by the State of Connecticut, or the right to seek a one-year extension.

89. Respondents violated Petitioners' Due Process Rights by rejecting a proposal to delay the vote on the Renaming Motions until March 1, 2022 so that additional information could be gathered, additional interested members of the general public could be made aware of and have an opportunity to provide feedback on the proposed team name changes for each particular school, and consent could be obtained from one of Connecticut's five Native American Tribes.

90. Respondents violated Petitioners' Due Process Rights by proceeding with their vote on the Renaming Motions when, due to a rising surge in the COVID-19 pandemic (Omicron variant), the general public was not permitted to organize and prepare to provide public comment on the proposed Renaming Motions, when there was no urgent legally recognized need for the vote to proceed under such circumstances when robust debate would be limited and where participation by interested persons (e.g. lower income, elderly people) would also be limited due to their lack of access to, or their ability to use the technology needed to attend the meeting and or provide comments to the Board.

91. Respondents violated Petitioners' Due Process Rights by arbitrarily and without adequate justification injuring the liberty, property, and dignity interests of current and former students, teachers, coaches, alumni and employees of the High Schools insofar as such persons and their families associate with, take pride in, benefit emotionally and financially from, and identify personally with the historically established team names used by the schools from which they graduated, played interscholastic sports, or otherwise closely associated with<sup>10</sup>.

---

<sup>10</sup> Hall High School has used the name "Warrior" since approximately 1952. Conard High School has used the name "Chieftain" since approximately 1957.

92. Respondents violated Petitioners' Due Process Rights by failing to publicly disclose any reasonable financial estimate of the total cost that WHPS (and the taxpayers) will incur as a result of the Renaming Motions.

93. Respondents violated Petitioners' rights under the Fourteenth Amendment of the U.S. Constitution and under Article I, §§4 & 5 of the Connecticut Constitution ("Freedom of Speech and Association Rights"), by arbitrarily and without adequate justification abridging the expressive and associational interests of current and former students, teachers, coaches, and alumni of the High Schools insofar as such persons and their families associate, express themselves through, and associate and identify themselves with, the team names of their alma mater.

Wherefore, Petitioners pray for judgment as follows:

1. For a writ of mandamus to be issued under Conn. Gen. Stat. § 52-485, ordering Respondents to rescind the votes taken on February 1, 2022, and repeal the Renaming Motions, or show cause before the Court at a time and place specified by the Court why they have not done so, and why a peremptory writ should not issue;
2. On return of the writ of mandamus and hearing on the order to show cause, for a peremptory writ of mandamus to be issued by this Court ordering the Respondents to rescind the votes taken on February 1, 2022 and repeal the Renaming Motions;
3. For a declaration that the votes taken by the Board on February 1, 2022, the corresponding Renaming Motions and all related actions are null and void, due to the Board's violations of the First and Fourteenth Amendments of the U.S. Constitutions, Article I, §§ 4, 5 and 8 of the Connecticut Constitution, and Board Policies 1700, 1800, 8120 and 8310;
4. For a stay, and temporary and permanent injunctions, enjoining the Board and WHPS and its



agents, employees, officers and representatives from undertaking any activity to implement the actions called for in the Renaming Motions and from approving new team names for the High Schools;

5. For costs of suit;
6. For such other and future equitable relief as the Court deems just and proper.

Dated this 6<sup>th</sup> day of June, 2022.

Respectfully Submitted,

By: Scott Zweig  
Scott Zweig, Esq

SCOTT ZWEIG; MARY MCGOWAN

Petitioners,

vs.

WEST HARTFORD BOARD OF  
EDUCATION; WEST HARTFORD PUBLIC  
SCHOOLS; THOMAS MOORE, in his official  
capacity; ANDREW MORROW in his official  
capacity;

Respondents.

)  
)  
) SUPERIOR COURT

)  
) J.D. OF HARTFORD

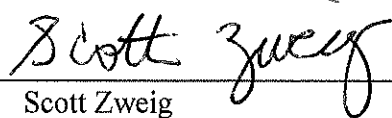
)  
) AT HARTFORD

)  
)  
) June 6, 2022

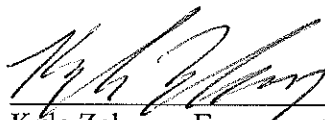
**VERIFICATION**

Scott Zweig, being duly sworn, deposes and says that I am a Petitioner in the above-entitled action. I have read the foregoing Verified Petition for Writ of Mandamus and Complaint for Declaratory and Injunctive Relief and know the contents thereof; and that the same are true to the best of my knowledge and belief.

By:

  
\_\_\_\_\_  
Scott Zweig

Personally appeared Scott Zweig who made oath to the truth of the matters contained in the foregoing Verified Petition and Complaint before me on this 6<sup>th</sup> day of June, 2022

  
\_\_\_\_\_  
Kyle Zelazny, Esq.  
Commissioner of the Superior Court